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By ECF

January 30, 2018

Hon. Steven L. Tiscione
U.S. Magistrate Judge
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Brooklyn, New York 11201

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MEMBER OF THE BAR:
NEW YORK — FLORIDA

Re: Michelle Carter v. JPMorgan Chase Bank, N.A.

JPMorgan Chase Bank, N.A. v. Dahaleel 1, Inc.
1, Inc., et al. (third-party action)
EDNY Docket No.: 17-cv-539 (AMD) (SLT)

Dear Judge Tiscione:

This office is counsel to Third-Party Defendants, Salah M. Omairat and Mazen Deli Grocery Corp. in the above-referenced matter.

We are in receipt of Plaintiff's counsel's letter of this date requesting an adjournment of the scheduled conference before your honor *on consent*.

We do not consent to the adjournment, but instead, request that the conference take place, as scheduled.

It is our intention to move forward with discovery, expeditiously, and to this end have requested of counsel for the Third Party Plaintiff, that they provide us with:

- A) All voluntary (Rule 26(a)) discovery received by them;
- B) All voluntary discovery produced by them;
- C) All demands for formal discovery received by them; and
- D) All demands for formal discovery produced by them.

To this date, we have received nothing, except a demand that our client enter into a non-disclosure agreement, which we believe is inappropriate, as to all or most of what we have requested.

For the foregoing reasons, we request that the conference be held to address these concerns.

Thank you for your consideration in this matter.

Respectfully submitted,

Michael T. Sucher

MTS:ams

cc: All appearing parties by ECF